

M E M O R A N D U M

April 11, 1979

Site: A.L. Taylor  
Break: 2.19  
Other: \_\_\_\_\_

RECEIVED  
APR 12 1979

TO: DAN DOLAN, Chief *LRD*  
Hazardous Waste Management Section

FROM: ROBERT L. SHOLAR, Environmental Specialist *RLS*  
Hazardous Waste Management Section

SUBJECT: Proposed Operation of a Chemical Waste Incinerator at the Taylor  
Illegal Dump Site

From a field representatives point of view, several objections to the proposed operation a chemical waste incinerator at the "Valley of Drums" site in Bullitt County come to mind:

- 1) The 20 acre (approx.) plot is grossly contaminated, as is the creek sediment around the site. EPA tests have verified that buried drums are on site and a strong probability exists that more than 10,000 drums of industrial waste are buried here (refer to memorandum dated April 10, 1979). How does one monitor a facility which is constructed on previously contaminated property?
- 2) And how can a field inspector enforce provisions of KRS 224 when state sponsorship of a facility may affect equal regulatory treatment?
- 3) Also, it is my understanding that Jefferson and Bullitt Counties are in non-compliance with air pollution standards and any emission at all would increase this problem.
- 4) The owner/operator of the proposed facility is essentially ignorant of the waste treatment and destruction business. He has a list of dubious connections within the industry (i.e. Chem-Dyne, Distler, etc.) and is now soliciting waste materials from industries in the Louisville area which his incinerator is not capable of handling (i.e. chlorocarbon solvent waste from duPont).
- 5) Information requested (in writing on January 31, 1979) from Mr. Fluhr regarding waste substances he had permission to dispose of has not been received and the whereabouts of the substances is unknown. In my opinion, Mr. Fluhr cooperates only when it is to his advantage to do so.

Further reservations regarding this solution to the Taylor Dump problem arise from the assistance he will receive from state agencies, (zoning alterations and permits) and the agencies implied responsibilities for that assistance. For instance, in the event of a serious fire or explosion while working "bugs" out of the incinerator, state sponsorship of a facility operated by inexperienced personnel seems to imply state negligence. Or in the case of gross mis-management and abandonment - again, the same considerations.

It is my opinion that the contaminant problem at the site can be more effectively solved by a combination of methods and that dealings with Liquid Processors, Inc. will only serve to compound the dilemma. The solution to the Valley of Drums



10951494

000128

Page 2

April 11, 1979

can be a moderately expensive feather in the cap of the Bureau or a cheap thorn in its side for years to come.

RLS/lrw

cc: Hussein Aldis